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November 30, 2020

The Honorable Katherine Polk Failla
Thurgood Marshall United States Courthouse
40 Foley Square
New York, New York 10007

Petróleos de Venezuela, S.A., et al. v. MUFG Union Bank et al., 1:19-cv-10023

Dear Judge Failla:

Together with our co-counsel at Latham & Watkins LLP, we represent defendants and counterclaim plaintiffs, the Trustee and Collateral Agent (together, the “Trustee”), in this case. We are writing on behalf of all parties pursuant to Rule 2(c) of this Court’s Individual Rules of Practice in Civil Cases to request an extension of the deadline to file a joint letter regarding the Trustee’s fee application, as ordered by the Court on November 24, 2020. ECF No. 219.

The Court’s order directed the parties to meet and confer and file a joint letter by November 30, 2020, “on the issue of whether the fee petition can and should be deferred pending the resolution of Plaintiffs’ appeal.” ECF No. 219. Counsel for the parties have met and conferred and are continuing to discuss between themselves and with their clients the issues raised by the Court’s order. In view of the potential complexity and significance of those issues and the Thanksgiving holiday, the parties jointly request a brief extension until December 7, 2020, to file their joint letter.

We are grateful for the Court’s attention to this matter.

Respectfully,

/s/ Jonathan Hurwitz

cc: Counsel of Record (Via ECF and Electronic Mail)